

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 7
MLCJR LLC, et al.,¹)	
)	Case No. 23-90324 (CML)
Debtors.)	
)	Jointly Administered
)	

TRUSTEE'S WITNESS AND EXHIBIT LIST

Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”) for the administratively consolidated estates of MLCJR, et al. (the “Estates”) submits this *Emergency Motion for the Entry of an Order (I) Approving The Trustee’s Entry Into The Purchase Agreement, (II) Authorizing The Sale Of Estate Property Free And Clear Of All Liens, Claims, Interests, And Encumbrances, (III) Authorizing The Assumption And Assignment Of Executory Contracts, And (IV) Granting Related Relief*[Doc. No. 2383]² (the “Motion”) currently set for hearing on March 6, 2025 at 11:00 a.m. (prevailing Central Time) (the “Hearing”) before Judge Christopher M. Lopez in Courtroom 401, 515 Rusk, Houston, TX 77002.

WITNESSES

The Trustee may, and reserves the right to, call the following witnesses at the Hearing:

1. Michael D. Warner, solely in his capacity as Trustee for the Estates;
2. W&T Offshore, Inc. and/or any of its current or former agents, officers, directors,

¹ The debtors in these cases (the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

² Unless otherwise specified, Doc. Nos. refer to Case No. 23-90324.

or employees.

3. Greyhound Energy, LLC, and/or any of its current or former agents, officers, directors, or employees;
4. Any witness designated or called by any other party;
5. Any witness necessary to rebut any evidence or testimony; and
6. Any witness necessary to authenticate any document;
7. Any witness needed for impeachment.

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
1.	The Motion				
2.	Proposed Order (I) Approving The Trustee's Entry Into The Purchase Agreement, (II) Authorizing The Sale Of Estate Property Free And Clear Of All Liens, Claims, Interests, And Encumbrances, (III) Authorizing The Assumption And Assignment Of Executory Contracts, And (IV) Granting Related Relief				
3.	Purchase and Sale Agreement				
4.	Schedule of Executory Contracts and Leases to be Assumed and Assigned				
5.	ROW OCS-G29020 Decommissioning Order				
6.	ROW OCS-G28673 Decommissioning Order				

7.	Schedule of Potential Lienholders				
8.	Greyhound Declaration of Charles Rougeau				
9.	February 26, 2025 Certificate of Service filed in record at Dkt. 2388 relating to service of the Motion.				
10.	March 4, 2025 Notice of Hearing filed in record at Dkt. 2397 relating to the Motion.				
11.	March 5, 2025 Certificate of Service filed in record at Dkt. 2398 relating to service of the Notice of Hearing.				

JUDICIAL NOTICE OF PLEADINGS

In the alternative, the Trustee requests this Court take judicial notice of the following documents:

Case No.	Docket No.	Description
23-90324	2383	The Motion, Proposed Order and Exhibits A-D
23-90324	2388	February 26, 2025 Certificate of Service filed in record at Dkt. 2388 relating to service of the Motion.
23-90324	2397	March 4, 2025 Notice of Hearing filed in record at Dkt. 2397 relating to the Motion.
23-90324	2398	March 5, 2025 Certificate of Service filed in record at Dkt. 2398 relating to service of the Notice of Hearing.

RESERVATION OF RIGHTS

Discovery is ongoing between the parties and the Trustee expressly reserves any and all rights to amend or supplement the foregoing *Trustee's Witness and Exhibit List*.

Dated: March 5, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN & ALTAZAN,
LLC**

By: /s/ Paul Douglas Stewart, Jr.
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*Counsel for Michael D. Warner, Chapter 7
Trustee*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing pleading was caused to be served upon all parties that are registered to receive electronic service through the court's ECF notice system in the above case on this 5th day of March 2025.

/s/ Paul Douglas Stewart, Jr.
Paul Douglas Stewart, Jr.